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[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA -FRESNO DIVISION

GAIL MALLARD-WARREN, M.D.,

Plaintiff,

v.

SAINT AGNES MEDICAL CENTER, THE  
MEDICAL STAFF OF SAINT AGNES  
MEDICAL CENTER and TRINITY HEALTH  
INC., NANCY HOLLINGSWORTH, and  
DOES 1-100,

Defendants.

Case No. 1:21-CV-01530-JLT-BAM

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO EXTEND  
TIME CONCERNING INITIAL  
DISCLOSURES, FILE RESPONSIVE  
PLEADINGS AND TO ESTABLISH  
RELATED DEADLINES**

**(E.D.L.R. 144(a))**

Judge: Jennifer L. Thurston  
Magistrate Judge: Barbara A. McAuliffe

Date Action Filed: October 15, 2021  
Trial Date: None Set

[Additional Counsel from Prior Page:]

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1 The Court further informed the parties that due to a significant backlog it “may still be many  
2 months until the motion in this matter is resolved.”

3 9. The parties are currently engaged in good faith attempts to explore a potential  
4 mediation.

5 10. On March 22, 2022 the parties filed the Joint Stipulation to Extend Time  
6 Concerning Initial Disclosures, File Responsive Pleadings and to Establish Related Deadlines.

7 11. On March 28, 2022 the Court granted the Joint Stipulation to Extend Time  
8 Concerning Initial Disclosures, File Responsive Pleadings and to Establish Related Deadlines.

9 12. Accordingly, the parties have agreed, and request that the Court order, that the  
10 following deadlines be extended:

- 11 a. Plaintiff's deadline for filing an Opposition to the Motion to Dismiss, currently  
12 set as April 12, 2022, be extended to May 12, 2022;
- 13 b. Defendants' deadline for filing an Anti-SLAPP Motion, if any, currently set as  
14 April 29, 2022, be extended to May 31, 2022.
- 15 c. Defendants' deadline for filing Replies in support of the Motion to Dismiss  
16 currently set as April 25, 2022, be continued to May 25, 2022.
- 17 d. The Parties' deadline for filing Initial Disclosures currently set as May 6, 2022,  
18 be continued to June 6, 2022.
- 19 e. Pursuant to Judge Thurston's minute order, (Doc.22), no hearing date will be  
20 calendared.

**STIPULATION**

IT IS HEREBY STIPULATED by the parties and their respective undersigned attorneys that, subject to the Court's approval:

- a. Plaintiff's deadline for filing an Opposition to the Motion to Dismiss, currently set as April 12, 2022, be extended to May 12, 2022.
- b. Defendants' deadline for filing an Anti-SLAPP Motion, if any, currently set as April 29, 2022, be extended to May 31, 2022.
- c. Defendants' deadline for filing Replies in support of the Motion to Dismiss currently set as April 25, 2022, be continued to May 25, 2022.
- d. The Parties' deadline for filing Initial Disclosures currently set as May 6, 2022, be continued to June 6, 2022.
- e. Pursuant to Judge Thurston's minute order, (Doc.22), no hearing date will be calendared.

THROUGH COUNSEL OF RECORD, IT IS SO STIPULATED.

Dated: April 11, 2022

**LAW OFFICES OF DANIEL HOROWITZ**

By: /s/ Daniel Horowitz  
DANIEL HOROWITZ  
Attorneys for Plaintiff

Dated: April 11, 2022

**LAW OFFICES OF WILLIAM C. HAESY**

By: /s/ William C. Haesy\*\*  
WILLIAM C. HAESY  
Attorney for Defendants Saint Agnes Medical  
Center, Trinity Health Corporation, and Nancy  
Hollingsworth

1 Dated: April 11, 2022

**ARENTFOX SCHIFF LLP**

2  
3 \*\* As Authorized on April 11, 2022

By: /s/ Diane Roldán\*\*

DIANE ROLDÁN

Attorneys for Defendant the Medical Staff of  
Saint Agnes Medical Center

**ORDER**

The Court having considered the parties' Joint Stipulation To Extend Time Concerning Initial Disclosures, File Responsive Pleadings And To Establish Related Deadlines and for good cause shown, **HEREBY ORDERS AS FOLLOWS:**

- a. Plaintiff's deadline for filing an Opposition to the Motion to Dismiss, currently set as April 12, 2022, be extended to May 12, 2022.
- b. Defendants' deadline for filing an Anti-SLAPP Motion, if any, currently set as April 29, 2022, be extended to May 31, 2022.
- c. Defendants' deadline for filing Replies in support of the Motion to Dismiss currently set as April 25, 2022, be continued to May 25, 2022.
- d. The Parties' deadline for filing Initial Disclosures currently set as May 6, 2022, be continued to June 6, 2022.
- e. Pursuant to Judge Thurston's minute order, (Doc.22), no hearing date will be calendared.

IT IS SO ORDERED.

Dated: April 12, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE